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May 11, 2021

Via ECF

Hon. Loretta A. Preska  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: USA v. Erdal Dere, 20 Cr. 501(LAP)

Dear Judge Preska:

I write to expand on occasion defendant Erdal Dere's geographic bail limits beyond SDNY, EDNY, Conn, and NJ to make short family related visits and sports related trips with his young children to other states by car as only permitted by Pre-Trial Services on 48 hours' notice to them and the government. All trips would be made by car and be limited to the East Coast of the United States with notice to Pre-Trial services and the government in order automatically to be able to make such trips instead of applying each time by letter application to your Honor. All health requirements will be observed. The government defers to Pre-Trial Services and Pre-Trial Services (Ms. DeFeo) believes this is an efficacious procedure subject to the approval of the court. May I respectfully request that the court So Order this application. The present expectation would be land travel to Pennsylvania, Connecticut, Virginia on occasion.

*To ordered  
Loretta A. Preska  
5/12/21*

cc: AUSA Jessica Greenwood  
Pre-Trial Services Courtney DeFeo

Respectfully submitted,

*Elliot G. Sagor*  
Elliot G. Sagor